

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Ryan Michael Francis Jennifer Marie Francis Debtors))))))	Case No. 23-22322-GLT Chapter 13 Doc. No. _____ Related to Doc. No. 96
RONDA J. WINNECOUR, TRUSTEE, Movant))))))	.
vs.))))))	
Ryan Michael Francis Jennifer Marie Francis Respondents))))))	

DECLARATION REGARDING TRUSTEE’S CERTIFICATE OF DEFAULT

AND NOW, come Debtors, Ryan Michael Francis and Jennifer Marie Francis, by and through counsel, Richard W. Schimizzi, Esquire and Schimizzi Law, LLC, and files the following Declaration regarding the Trustee’s Certificate of Default:

1. Debtors’ currently mailing address is 339 Sheffield Drive, Greensburg, PA 15601.
2. Debtors are currently in arrears in the plan payment by \$11,894.00, as of May, 2025.
3. The reason for the arrears is due to substantially reduced income from Debtors’ employment.
4. A settlement of a workers’ compensation claim of Debtor Michael Ryan Francis is pending and, once approved, will be sufficient to bring the plan current.
5. By Order of Court dated May 14, 2025, (Doc 101), the Court ordered the workers’ compensation settlement proceeds be paid to the chapter 13 Trustee within two weeks of the Order becoming final.
6. Counsel for Debtors has been in contact with Debtor’s workers’ compensation counsel and if it is determined that the settlement proceeds cannot be paid to the chapter 13 Trustee within

the two-week period allowed under the Order, counsel for Debtors will request additional time to complete the settlement and pay the settlement proceeds to the chapter 13 Trustee.

WHEREFORE, it is respectfully requested that the Trustee's Certificate of Default be dismissed for the reason that Debtors will be providing for payment in full of the Plan arrears out of the workers' compensation settlement. .

Respectfully submitted:
SCHIMIZZI LAW, LLC

Dated: May 22, 2025

BY: /s/ Richard W. Schimizzi
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